



following interim deadlines may be extended by the parties on consent without application to the Court, provided the parties meet the fact discovery completion date in paragraph 6 above:

- a. Initial requests for production of documents to be served by May 20, 2015.
  - b. Interrogatories to be served by May 20, 2015.
  - c. Depositions to be completed by July 31, 2015.
  - d. Requests to Admit to be served no later than May 20, 2015.
8. At this time, neither Party intends on offering expert testimony. In the event that a Party decides to offer expert testimony, that Party must make the disclosure no later than June 1, 2015.

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